

Robert A. Julian (SBN 88469)  
Cecily A. Dumas (SBN 111449)  
BAKER & HOSTETLER LLP  
1160 Battery Street, Suite 100  
San Francisco, CA 94111  
Telephone: 628.208.6434  
Facsimile: 310.820.8859  
Email: rjulian@bakerlaw.com  
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)  
Lauren T. Attard (SBN 320898)  
BAKER & HOSTETLER LLP  
11601 Wilshire Boulevard  
Suite 1400  
Los Angeles, CA 90025  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Email: esagerman@bakerlaw.com  
Email: lattard@bakerlaw.com

*Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors**

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

**DECLARATION OF KODY KLEBER IN  
SUPPORT OF MOTION OF THE  
OFFICIAL COMMITTEE OF TORT  
CLAIMANTS FOR ENTRY OF AN  
ORDER AUTHORIZING THE FILING  
OF REDACTED DOCUMENTS  
ATTACHED TO A REPLY IN SUPPORT  
OF MOTION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
TO COMPEL PRODUCTION OF  
THIRD-PARTY CONTRACTOR  
DOCUMENTS**

1 KODY D. L. KLEBER, under penalty of perjury, declares:

2 1. I am a partner at Baker & Hostetler LLP, counsel to the Official Committee of Tort  
3 Claimants (the “TCC”) of PG&E Corporation and Pacific Gas and Electric Company (the  
4 “Debtors”) in these chapter 11 cases.

5 2. I submit this Declaration in support of the Motion of the Official Committee of Tort  
6 Claimants for Entry of an Order Authorizing the Filing Of Redacted Documents Attached to a  
7 Reply in Support of Motion of the Official Committee of Tort Claimants to Compel Production of  
8 Third-Party Contractor Documents (“Redaction Motion”).

9 3. The TCC filed a Reply in Support of Motion of the Official Committee of Tort  
10 Claimants to Compel Production of Third-Party Contractor Documents (the “Sealed Reply”) under  
11 seal on August 20, 2019 [Docket Nos. 3626–3630]. Throughout the Reply, the TCC cites and  
12 attaches documents designated as “Contractor Confidential” under the Confidentiality and  
13 Protective Order, entered by this Court on July 1, 2019 [Docket No. 2807-1]. The confidential  
14 documents are necessary in demonstrating to the Court specific deficiencies in Debtors’  
15 productions.

16 4. On Tuesday, August 20, 2019, counsel for the TCC asked counsel for the Debtors  
17 to remove confidentiality designations for the confidentially-designated documents referenced and  
18 attached in the Reply. As of the time of the filing of the Sealed Reply, the TCC had not reached an  
19 agreement with the Debtors to waive confidentiality designations.

20 5. On Friday, August 23, 2019, counsel for the Debtors agreed to allow the TCC to  
21 publicly file the Reply, provided the TCC redact pricing terms in the confidentially-designated  
22 attached documents.

23 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States*  
24 *of America that the foregoing is true and correct to the best of my knowledge and belief.*

25  
26 Executed on August 26, 2019

/s/ Kody D.L. Kleber  
By: Kody D. L. Kleber  
Admitted Pro Hac Vice